

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Case No: 18-23538 (RDD)

Chapter 11

(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF JAMES N. LAWLOR IN  
SUPPORT OF THE APPLICATION OF THE OFFICIAL  
COMMITTEE OF RETIREES WITH LIFE INSURANCE BENEFITS  
OF THE SEARS HOLDINGS CORPORATION, ET AL. TO RETAIN  
AND EMPLOY WOLLMUTH MAHER & DEUTSCH LLP AS  
COUNSEL, *NUNC PRO TUNC* TO JULY 9, 2019**

Under 28 U.S.C. § 1746, I, James N. Lawlor, declare as follows under the penalty of perjury:

1. I am an attorney admitted to practice in the State of New York and before the United States District Court for the Southern District of New York.
2. I am a partner of the firm of Wollmuth Maher & Deutsch LLP (“WMD” or the “Firm”). WMD maintains offices at, among other places, 500 Fifth Avenue, New York, New York 10110. There are no disciplinary proceedings pending against me.
3. I am familiar with the matters set forth herein and make this declaration (the “Declaration”) in support of the application (the “Application”)<sup>1</sup> of the Official Committee of Retirees With Life Insurance Benefits (the “Retirees Committee”) of Sears Holdings Corporation and its affiliated debtors and debtors in possession (collectively, the “Debtors”) authorizing and

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

approving the Retirees Committee's retention and employment of WMD as counsel to the Retirees Committee.

4. The Office of the United States Trustee has requested that the Firm disclose the amount of fees and expenses incurred for its work on behalf of two individual creditors in this case. Specifically, prior to the formation date of the Retirees Committee, the Firm represented Richard Bruce and Ronald Olbrysh individually in their successful efforts to have a committee appointed. During that approximate two-month period, roughly \$53,706.50 in fees and \$225.00 in out of pocket expenses were billed or incurred.

5. The Firm billed at its customary hourly rates as set forth below, for the preformation work and intends to file an application seeking a substantial contribution claim.

<b><u>Billing Category</u></b>	<b><u>Range</u></b>
Partners	\$ 725 - \$ 825
Counsel	\$ 700 - \$ 725
Associates	\$ 305 - \$ 675
Paraprofessionals	\$ 195

6. The names, positions and 2019 hourly rates of the WMD attorneys currently expected to have primary responsibility for providing services to the Retirees Committee are as follows:

<b><u>Attorney</u></b>	<b><u>Position/Department</u></b>	<b><u>Hourly Rate</u></b>
James Lawlor	Partner / Bankruptcy & Restructuring, Litigation & Dispute Resolution, and Corporate Group	\$ 780
Brad Axelrod	Partner / Bankruptcy, Restructuring and Insolvency, Corporate and Securities Group	\$ 825
Cassandra Postighone	Associate / Litigation & Dispute Resolution Group	\$ 445

I declare under penalty of perjury that the foregoing is true and correct on this nineteenth day of  
August 2019.

/s/ James N. Lawlor

James N. Lawlor